

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ANDRE WILSON,

Plaintiff,

v.

AMERICAN COLLECTION SERVICES,
INC.,

Defendant.

Case No. CIV-21-212-C

NOTICE OF REMOVAL

Defendant, American Collection Services, Inc. (“ACS”), for its Removal of the above-styled cause to this Court, respectfully states:

1. On or about February 23, 2021, a Small Claims case was filed against Defendant in the District Court of Comanche County, entitled *Andre Wilson v. American Collection Services, Inc.*, under case no. SC-2021-150.

2. In the Affidavit, Plaintiff asserts FDCPA and FCRA violations by Defendant.

3. Defendant was served with the Affidavit and the Court’s Order setting hearing on February 26, 2021.

4. Defendant will enter its appearance contemporaneously herewith this Notice of Removal.

5. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which Defendant was served with Plaintiffs’ Petition. *See* 28 U.S.C. § 1446.

6. A true and accurate copy of the state court docket sheet in the case is attached as **Exhibit 1**.

7. A copy of all documents filed or served in the state court action, Plaintiff's Affidavit and Order setting hearing, is attached as **Exhibit 2**.

8. Plaintiff is a resident of the City of Cache in Comanche County, Oklahoma.

9. Defendant American Collection Services, Inc. is an Oklahoma corporation.

10. This case is a civil action which may be removed to this Court by Defendant under the provision of 28 USC § 1331, in that the matter in controversy involves a federal question arising under the laws of the United States in which "district courts shall have original jurisdiction". Plaintiff claims Defendant is indebted to Plaintiff based on alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692-1692p and the Fair Credit Reporting Act, 15 U.S.C. §§ 1681-1681x.

11. Notice will be immediately provided to the Clerk of the District Court of Comanche County.

WHEREFORE, Defendant American Collection Services, Inc. prays that this Court assumes jurisdiction of this cause and proceeds with it to completion and enters such orders and judgments as may be necessary to protect its jurisdiction or as justice may require.

Respectfully submitted,

s/ Robert E. Norman

ROBERT E. NORMAN, OBA #14789

CHEEK & FALCONE, PLLC

6301 Waterford Blvd., Suite 320

Oklahoma City, OK 73118-1168

Telephone: (405) 286-9191

Facsimile: (405) 286-9670

rnorman@cheekfalcone.com

*Attorney for Defendant, American
Collection Services, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2021, I filed the attached document with the Clerk of the Court and served the attached document by first class mail, postage prepaid, on the following, who is not a registered participant of the Electronic Case Filing System:

Andre Wilson
210 NW Cherry Ave.
Cache, OK 73527

s/ Robert E. Norman

S:\11173.012\ (108671).docx